

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

NATHANIEL J. BROUGHTY,

Plaintiff,

v.

CHRISTOPHER E. BOUZY,

Defendant.

Case No. 2:22-cv-6458-SDW-AME

**NOTICE OF MOTION TO
DISMISS PURSUANT TO
FEDERAL RULE OF CIVIL
PROCEDURE 12(b)(6)**

MOTION TO DISMISS FIRST AMENDED COMPLAINT

TO: Ronald D. Coleman
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Attorneys for Plaintiff

PLEASE TAKE NOTICE that on December 18, 2023, or as soon thereafter as counsel may be heard, the undersigned attorneys for Defendant Christopher E. Bouzy will move the United States District Court for the District of New Jersey, the Honorable Susan D. Wigenton, at the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07101, for an Order dismissing the First Amended Complaint filed by Plaintiff Nathaniel J. Broughty

(“Plaintiff”), with prejudice, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure.

PLEASE TAKE FURTHER NOTICE that the undersigned shall rely upon the accompanying memorandum of law in support of this motion and the Second Certification of William P. Reiley and exhibits thereto.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is attached hereto.

Dated: November 8, 2023

Respectfully submitted,

BALLARD SPAHR LLP
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